Karen L. Willis, J.D. 220 West G Street, Suite E. San Diego, CA. 92101 (619) 206-5311

January 21, 2020

**VIA EMAIL** 

The Hon. Judge Cathy Seibel 300 Quarropas St., Courtroom 621 White Plains, NY 10601-4150

**RESPONSE TO COURT'S MEMO ENDORSEMENT OF JANUARY 17, 2020** 

Dear Hon. Judge Seibel:

In response to the court's Memo Endorsement dated January 17, 2020, I inform the court that such attempt to agree on another date with the other parties wherein I could appear in person would likely prove futile considering that I am not in the position to travel to New Year prior to mid-April, or May 2020.

I think that would present an unreasonable delay when in fact I can appear telephonically as scheduled. I will commit however to talking as slowly and clearly as possible while on court call for the scheduled hearing.

If the court is inclined to consider a mid to late April or May hearing date, please let me know and I'll confer with the other parties now that they are on noticed as to the earliest I could be in New York.

Respectfully submitted,

Karen L. Willis